REMARKS/ARGUMENTS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 1, 3, and 6-15 are currently being amended, and Claim 16 is being cancelled. After amending the claims as set forth above, Claims 1-15 are now pending in this application.

Claim Rejections Under 35 U.S.C. § 103(a)

In Section 2 of the Office Action, Claims 1-15 are rejected under 35 U.S.C. § 102(a) as being anticipated by European Patent Application No. 1,071,296 to Leroy et al. (hereinafter "Leroy"). Applicants respectfully traverse the rejection.

As currently amended, Claim 1 recites:

> receiving the data packet, wherein the data packet includes a unicast destination address corresponding to a mobile node;
>
> generating a link-layer frame, wherein the link-layer frame includes a broadcast address and the unicast destination address; and
>
> sending, via the broadcast address, the link-layer frame to a plurality of access devices, wherein at least one access device of the plurality of access devices supports the mobile node.

(Emphasis added). Claim 11, as currently amended, recites "a receiving unit configured to receive a link-layer frame which is addressed to a multicast broadcast address, wherein the link-layer frame includes the multicast broadcast address and a unicast destination address of a mobile node." (Emphasis added). Claim 15, as currently amended, recites "a receiving unit configured to receive the data packet, wherein the data packet includes a unicast destination address corresponding to a mobile node." (Emphasis added). Applicants respectfully submit that Leroy does not teach, suggest, or describe the handling of a data packet which is directed toward "a unicast destination address," as recited in Claims 1, 11, and 15.

Leroy discloses a method of eliminating redundant transmissions of data packets which are directed toward multicast addresses. (Col. 10, lines 5-11). Specifically, an "IP data packet

PU-DP" which includes "an internet multi-cast address PU-MCA in the destination address field" is received by an IP router. (Col. 5, line 58 – col. 6, line 6). The IP router forwards the IP data packet to "gateway nodes GGSN1 and GGSN2." (Col. 6, lines 23-24; fig. 1). The "gateway nodes ... encapsulate an IP data packet PU-DP ... in a private data packet PR-DP that can be routed through the GPRS-SYSTEM towards the destination mobile stations." (Col. 6, lines 23-28). Leroy further discloses that "the gateway node GGSN1 that encapsulates the IP data packet PU-DP in the private data packet PR-DP fills the destination address field of the private data packet header PR-H with a private multi-cast address PR-MCA **when the destination address field of the IP data packet PU-DP contains an internet multi-cast address PU-MCA**." (Col. 6, lines 39-45). The private data packet is forwarded a single time to each serving node which supports one or more recipients of the IP data packet, where recipients of the IP data packet are identified using a "routing table" which keeps track of multi-cast group members. (Col. 10, lines 4-22).

Thus, Leroy discloses a method for transmitting data packets addressed to a multi-cast group to each member of the multi-cast group. A private data packet which includes a private multi-cast address corresponding to the public multi-cast address is created. The private data packet is forwarded to serving nodes which support members of the multi-cast group. The serving nodes and members are identified via routing tables. At the serving nodes, the private data packet is duplicated (if necessary) and forwarded to the members of the multi-cast group. Resources are conserved because the private data packet is only forwarded a single time to each serving node which supports a member of the multi-cast group.

Applicants respectfully submit that Leroy does not teach, suggest, or describe the handling of a data packet which is addressed to a "unicast destination address," as recited in Claims 1, 11, and 15. Leroy is entirely directed toward a method for improving the delivery of multi-cast data packets, and does not mention data packets which are addressed to unicast addresses. Conversely, Applicants claimed invention utilizes a multi-cast technique to route a unicast data packet when the link-layer address of the destination mobile node is unknown.

For at least these reasons, Applicants respectfully submit that Leroy does not teach each of the limitations recited in independent Claims 1, 11, and 15. Applicants respectfully request withdrawal of the rejection of Claims 1, 11, and 15 under 35 U.S.C. § 103(a). For at least the same reasons, Applicants respectfully request withdrawal of the rejection of Claims 2-10 and 12-14, which depend from Claims 1 and 11, respectively.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorize payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date 08/27/07

By Christopher L. Kalafut

FOLEY & LARDNER LLP
Customer Number: 23524
Telephone: (608) 258-4286
Facsimile: (608) 258-4258

Christopher L. Kalafut
Attorney for Applicant
Registration No. 57,946